

**BOARD OF SUPERVISORS**

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September 19, 2008

Mary D. Nichols, Chair  
California Air Resources Board  
1001 "T" Street  
Sacramento, California 95814

RE: Climate Change Scoping Plan, June 2008 Discussion Draft

Dear Chair Nichols:

Amador County welcomes the opportunity to comment on the June 2008 Discussion Draft of the Climate Change Scoping Plan, and appreciates the efforts of ARB to reach out to local governments during this process. However, we are concerned that the document does not adequately address the serious issue of catastrophic wildfire, and believe that wildfire mitigation and prevention are vital to ARB's success in meeting the goals set forth in AB 32.

As you are aware, in May 2008, Governor Schwarzenegger issued Executive Order S-03-08, which specifically directed CalEPA and the California Resources Agency to oversee the Climate Action Team's development of measures for wildfire fuels reduction and biomass utilization. In light of the Executive Order, the current rampant wildfires around the state, and the Governor's recent emergency declarations, we are troubled that no such measures have been outlined in the Scoping Plan.

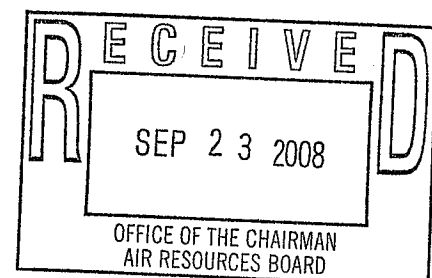
Recent wildfires statewide have had major impacts on air quality, contributing significantly to California's carbon and particulate emissions. As the wildfire season progresses, thousands of acres of forest lands will needlessly burn, releasing even more carbon and further contributing to our poor air quality. Catastrophic wildfires are typically on United States Forest Service (USFS) lands, and we maintain that many of those fires, along with the corresponding emissions, could be prevented if USFS lands were more efficiently managed. We are concerned that the Draft Scoping Plan makes only a vague mention of fuels reduction and fails to address emissions from fires on USFS lands.

Amador County strongly urges ARB to include in the Final Draft Scoping Plan a firm commitment by the state to join with local governments to advocate at the federal level for enhanced management on USFS lands, as well as an extensive program to quantify wildfire emissions that could be avoided through better forest management practices. This is vital not only in meeting the goals of AB 32, but more importantly to improving the quality of the air and public health. We thank you for your consideration of our comments.

Sincerely,

Richard M. Forster  
Chairman

cc: Governor Arnold Schwarzenegger  
Patricia Megason, Regional Council of Rural Counties  
Karen Keene, California State Association of Counties



**BEFORE THE BOARD OF SUPERVISORS OF THE  
COUNTY OF AMADOR, STATE OF CALIFORNIA**

IN THE MATTER OF:

|                                    |   |                       |
|------------------------------------|---|-----------------------|
| RESOLUTION REQUESTING THE GOVERNOR | ) | RESOLUTION NO. 08-186 |
| TAKE AN ACTIVE ROLE IN MITIGATING  | ) |                       |
| THE RISK OF CATASTROPHIC WILDFIRES | ) |                       |

WHEREAS, catastrophic wildfires continue to threaten lives, property and the natural resources of the State of California; and

WHEREAS, the insurance losses for the 2007 Fire Season in Southern California were \$1.6 billion and the Angora Fire in the Tahoe basin was more than \$150 million alone and insurers have paid out in excess of \$8 billion to thousands of policy holders from the top 10 California wildfires since 1970; and

WHEREAS, the estimated loss of employment from the 2007 Southern California fires was in excess of \$500 million; and

WHEREAS, Amador County has a total land area of 363,500 acres of which over 34% (87,270 acres) is federal land; and

WHEREAS, 20,779 acres of Amador County have been destroyed by catastrophic wildfire over the last five years, which destroyed lives, property, businesses, and the environment; and

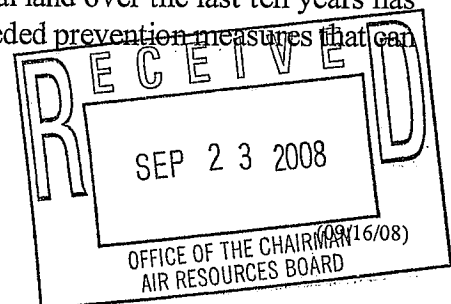
WHEREAS, California has over 43 million acres of federal land, much of which has not been adequately managed to mitigate the risk of catastrophic wildfire; and

WHEREAS, two of the three largest wildfires in California in the past 100 years began on federally-owned land; and

WHEREAS, there are thousands of acres of land with dead, dying, diseased, and decaying trees in the national forests within Amador County due to excessive environmental rules, restrictions and requirements which hinder the removal of these trees; and

WHEREAS, millions of dollars are spent each year fighting fires in our national forests; and

WHEREAS, the escalating costs of fighting fires on federal land over the last ten years has significantly diminished the available resources for the critically needed prevention measures that can minimize these catastrophic fires; and



WHEREAS, the U.S. Forest Service and Department of Interior have spent over \$1 billion on fire suppression every year since 2000 with suppression costs now consuming over 50% of the total wildland fire budget as compared to 13% of the total fire budget in 1991, leaving few resources for critically needed preventive maintenance of our national forests in the west and throughout the country; and

WHEREAS, the resources to manage the federal lands to reduce fire risk would be a small investment relative to the skyrocketing costs of fire suppression; and

WHEREAS, the State of California has made significant strides towards reducing the risk of catastrophic wildfires on state and private lands such as ranking lands as to the level of the fire hazard, requiring 100 feet of defensible space around homes, requiring ignition-resistant materials on all new construction that is built in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any designated Wildland-Urban Interface (WUI) Fire Area, and many other things to not only address preservation of life and property but the environmental risks of large scale wildfire as well; and

WHEREAS, the increased risk of catastrophic wildfires in Amador County will result in harmful secondary environmental effects, including diminished air and water quality, impacted watershed, increased air pollutant emissions, and threatened habitats of wildlife species; and

WHEREAS, approximately eighty percent of the State's developed surface water supply originates on watershed lands within our rural counties. California's residents use a portion of this water for domestic, commercial, agricultural, industrial, recreational, and other beneficial uses and these rivers, lakes, and watershed lands also serve as habitat for hundreds of species of fish and wildlife; and

WHEREAS, the detrimental effects on these watersheds affect all of California, not just rural California; and

WHEREAS, the mitigation of wildfire emissions is vital to reach the goals stated in the California Global Warming Act of 2006 (AB 32); and

WHEREAS, the Draft AB32 Scoping Plan, released in June 2008, fails to adequately address the need to mitigate wildfires and the importance of quantifying and modeling wildfire emissions on private, state, and federal lands; and

WHEREAS, there continues to be a widely recognized extremely high risk of catastrophic wildfires in Amador County due to unnaturally heavy fuel loads and the early drying of wild land vegetation; and

WHEREAS, the Amador County Board of Supervisors calls for immediate measures to be taken to prevent imminent catastrophic wildfires; and

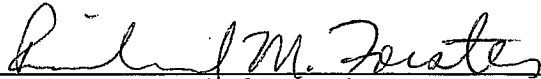
NOW, THEREFORE, BE IT RESOLVED that the Amador County Board of Supervisors declares that there is an ongoing emergency due to the threat of wildfire in California, that the state and the local governments have taken many steps to resolve this issue and now requests that the Governor take an active role at the federal level to demand that the United States Forest Service take action on Federal National Forest lands located in California to do the prevention and management work required to mitigate the risk of catastrophic wildfires.

The foregoing resolution was duly passed and adopted by the Board of Supervisors of the County of Amador at a regular meeting thereof, held on the 16<sup>th</sup> day of September 2008 by the following vote:

AYES: Richard M. Forster, Theodore Novelli, Louis D. Boitano, Rich F. Escamilla, and Brian Oneto

NOES: None

ABSENT: None

  
Chairman, Board of Supervisors

ATTEST:

JENNIFER BURNS, Clerk of the  
Board of Supervisors, Amador County,  
California

  
Deputy